

Facility Name: **LJR Forest Products**
City: Swainsboro
County: Emanuel
AIRS #: 04-13-107-00030

Application #: TV-501298
Date Application Received: August 3, 2020
Permit No: 2499-107-0030-V-04-0

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Jeng-Hon Su
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SSCP	William Fleming	Steve Allison
Toxics	N/A	N/A
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: LJR Forest Products

2. Parent/Holding Company Name

LJR Forest Products, LLC

3. Previous and/or Other Name(s)

Not applicable.

4. Facility Location

1377 Old Nunez Road
Swainsboro, Georgia 30401
(Emanuel County)

5. Attainment, Non-attainment Area Location, or Contributing Area

LJR Forest Products (hereinafter "facility") is located in an attainment area for all regulated criteria pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Permit No. 2499-107-0030-V-03-0	February 11, 2016	Initial Title V
Amendment No. 2499-107-0030-V-03-1	September 15, 2016	Construction and operation of one new hammermill, three pellet mills and one pellet cooler.
Amendment No. 2499-107-0030-V-03-2	September 27, 2017	Correction of permit conditions
Amendment No. 2499-107-0030-V-03-3	September 4, 2018	Replacement dryer
Amendment No. 2499-107-0030-V-03-4	March 3, 2020	Construction and operation of two pellet mills to Pelleting Process A and two pellet mills to Pelleting Process B.

D. Process Description

1. SIC Codes(s)

2499

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Wood Pellets

3. Overall Facility Process Description

The plant's furnish is made up from green (wet) chips and dry shavings. Green shavings are unloaded onto the green (wet) chip storage pad (CSP). Dry shavings are unloaded onto the dry shavings pad (DSP). After screening, green (wet) chips are conveyed by enclosed belt to a hammer mill (HMD1) and into the dryer equipped with a direct-fired suspension burner utilizing dry pine fines. The dried flakes are then transferred to the warehouse storage pad (DSP), screened, and conveyed into Pelleting Process A (hammermill HMD1, pellet mills, pellet cooler CO1, and aspirator ASP1). All of these units vent through each other and ultimately exhaust through baghouse (BH1). Pelleting Process A is designed to produce pellets from green (wet) chips. Pelleting Process B (hammermill HMD2, pellet mills, pellet cooler CO2, and aspirator ASP2) utilize dry shavings only. All of these units vent through each other and ultimately exhaust through baghouse (BH2). The finished pellets from Pelleting Process A and Pelleting Process B are stored in the Load Out Station (LOS) to await delivery to the port for export.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Though the facility is potentially a major source under PSD/NSR regulations, the facility avoids any PSD/NSR requirements with a facility wide limit of 249 tpy for VOC emissions.

In order to verify emissions and ensure PSD avoidance, carbon monoxide (CO) emissions and particulate matter (PM) emissions are limited to less than 249 tpy also.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes	✓		
PM ₁₀	Yes	✓		
PM _{2.5}	Yes	✓		
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓
CO	Yes	✓		
TRS	No			
H ₂ S	No			
Individual HAP	Yes		✓	
Total HAPs	Yes		✓	
Total GHG	Yes			✓

3. MACT Standards

There are no applicable MACT standards for this facility.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility wide VOC emissions are limited to 249 tpy in order to avoid PSD requirements. There is also a facility wide HAP emission limit of less than 25 tpy for combined HAP emissions and 10 tpy for single HAP emissions in order to avoid MACT requirements.

In order to verify emissions and ensure PSD avoidance, the facility is also limited to 249 tpy carbon monoxide (CO) emissions and particulate matter (PM) emissions. The CO and PM emission limits ensure that the facility continues to track these emissions and that the facility continues to not be subject to PSD requirements.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no facility wide compliance issues noted in this application.

D. Permit Conditions

- Condition 2.1.1 limits VOC emissions from the entire facility to less than 249 tons during any twelve consecutive month period in order to avoid PSD requirements.
- Condition 2.1.2 limits CO emissions from the entire facility to less than 249 tons during any twelve consecutive month period in order to ensure on going emissions monitoring and to ensure PSD avoidance.
- Condition 2.1.3 limits combined HAP emissions to 25 tons during any twelve consecutive month period and any individual HAP emission to 10 tons during any twelve consecutive month period in order to avoid MACT requirements.
- Condition 2.1.4 limits PM emissions from the entire facility to less than 249 tons during any twelve consecutive month period in order to ensure on going emissions monitoring and to ensure PSD avoidance.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
HMW	Wet hammermill (reduction of green shavings)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
HMF	Fuel Hammermill (reduce wood furnish to be used for burner fuel)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CYF	Cyclone
BU1/DY2	Burner/Dryer (40 MMBtu burner combined with triple pass dryer)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	CY1	Cyclone
PELLETING PROCESS A				
HMD1	Hammermill for dry wood furnish (Bliss Model E-4460-TFA) / 350 hp mill / chips size reduction of dry wood furnish	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PM1	Pellet Mill 1 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PM2	Pellet Mill 2 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PM3	Pellet Mill 3 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PM7	Pellet Mill 7 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PM8	Pellet Mill 8 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
CO1	Pellet Cooler (Bliss Model 12-289-6A)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
ASP1	Aspirator (Kice Model 4E36) / removes the fines from cooled pellets	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PELLETING PROCESS B				
HMD2	Hammermill for dry wood furnish (Bliss Model E-4460-TFA) / 350 hp mill / chips size reduction of dry wood furnish	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
PM4	Pellet Mill 4 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
PM5	Pellet Mill 5 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
PM6	Pellet Mill 6 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
PM9	Pellet Mill 9 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
PM10	Pellet Mill 10 (Bliss Model 200B-141) / 500hp mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
CO2	Pellet Cooler (Bliss Model 12-289-6A)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
ASP2	Aspirator (Kice Model 4E36) / removes the fines from cooled pellets	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH2	Baghouse
DSP	Dry Shavings Pad (storage)	391-3-1-.02(2)(n)	--	--
DH	Dry Hopper	391-3-1-.02(2)(n)	--	--
CSP	Wet Chip Pad	391-3-1-.02(2)(n)	--	--
LOS	Load Out Station	391-3-1-.02(2)(n)	--	--
SCW	Wet Chip Screener	391-3-1-.02(2)(n)	--	--
WH	Green Chip Hopper	391-3-1-.02(2)(n)	--	--

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps –

The facility has facility wide limits of 249 tpy carbon monoxide (CO) emissions, 249 tpy particulate matter (PM) emissions, 249 tpy of VOC emissions and 25/10 HAP emissions. Pelleting Process A previously had a processing limit of no more than 300,000 tpy of wet (green) wood shavings nor produce more than 131,400 tpy of oven dried chips. Based on production data and revised emission factors from testing conducted in October 2020, the facility proposed a new processing limit for Pelleting Process A to be 150,000 of oven dried chips. Pelleting Process B previously had a processing limit of no more than 131,400 tpy of dry wood shavings. Based on production data and revised emission factors from testing conducted in October 2020, the facility proposed a new processing limit for Pelleting Process B to be 150,000 of dry wood shavings.

The following tables show the emission factors and the potential emissions are calculated at the bottom rows of the table using current production limits and proposed production limits. Table 1 uses the current, allowed emission factors and the current production limits. Table 2 shows what the potential emissions would be using the most recent emission factors from October 2020 and the current production limits. Table 3 shows the potential emissions using the most recent emission factors from October 2020 and the proposed production limits.

Table 1: Current Permit Factors and Current Production Limits

	PM	NOX	CO	VOC	TVOC	MeOH	HCHO	ACET	OHAP[2]	THAP[3]
Dryer[1]	1.42	3.8	3.8	2.80	2.99	0.06	0.07	0.06	0.05	0.24
Pelleting Line 1	0.28	--	--	0.291	0.30	0.005	0.002	0.002	--	0.009
Pelleting Line 2	0.28	--	--	0.291	0.30	0.005	0.002	0.002	--	0.009
Fuel Hammermill	0.28	--	--	--	--	--	--	--	--	--
Pellet Handling/Storage	--	--	--	0.40	0.404	0.001	0.002	0.001	--	0.004
Total PTE (tpy)	132.8	249.7	249.7	222.197	235.9	4.60	4.86	4.20	3.29	15.8
Fugitive PTE (tpy)				52.6	53.1	0.13	0.26	0.13	--	0.53

[1] All DRYER emission factors expressed in lb/ODT. All OTHER emission factors expressed in lb/ton.

Table 2: October 2020 Permit Factors and Current Production Limits

	PM	NOX	CO	VOC	TVOC	MeOH	HCHO	ACET	OHAP[2]	THAP[3]
Dryer[1]	1.227	0.28667	0.74222	1.444	1.660	0.081	0.098	0.036	0.05	0.27
Pelleting Line 1	0.041	--	--	0.800	0.819	0.010	0.005	0.003	--	0.019
Pelleting Line 2	0.022	--	--	0.800	0.819	0.010	0.005	0.003	--	0.019
Fuel Hammermill	0.047	--	--	--	--	--	--	--	--	--
Pellet Handling/Storage	--	--	--	0.400	0.404	0.001	0.002	0.001	--	0.004
Total PTE (tpy)	85.2	18.8	48.8	200	217	6.71	7.11	2.75	3.29	17.4
Fugitive PTE (tpy)				52.6	53.1	0.13	0.26	0.13	--	0.53

[1] All DRYER emission factors expressed in lb/ODT. All OTHER emission factors expressed in lb/ton.

Table 3: October 2020 Permit Factors and Proposed Production Limits

	PM	NOX	CO	VOC	TVOC	MeOH	HCHO	ACET	OHAP[2]	THAP[3]
Dryer[1]	1.227	0.28667	0.74222	1.444	1.660	0.081	0.098	0.036	0.05	0.27
Pelleting Line 1	0.041	--	--	0.800	0.819	0.010	0.005	0.003	--	0.019
Pelleting Line 2	0.022	--	--	0.800	0.819	0.010	0.005	0.003	--	0.019
Fuel Hammermill	0.047	--	--	--	--	--	--	--	--	--
Pellet Handling/Storage	--	--	--	0.400	0.404	0.001	0.002	0.001	--	0.004
Total PTE (tpy)	97.3	21.5	55.7	228	247	7.66	8.11	3.14	3.75	19.9
Fugitive PTE (tpy)				60.0	60.6	0.15	0.30	0.15	--	0.60

[1] All DRYER emission factors expressed in lb/ODT. All OTHER emission factors expressed in lb/ton.

Applicable Rules and Regulations -

Rules and Regulations Assessment:

The facility will continue to be subject to the following:

- Georgia Air Quality Rule 391-3-1-.02(2)(b) - *Visible Emissions*
- Georgia Air Quality Rule 391-3-1-.02(2)(e) - *Particulate Emission from Manufacturing Processes*
- Georgia Air Quality Rule 391-3-1-.02(2)(n) – *Fugitive Emissions*

The Burner (BU1) is subject to Georgia Air Quality Rule 391-3-1-.02(2)(g) – *Sulfur Dioxide*.

In order to avoid PSD, the facility wide potential VOC, CO and PM emissions will continue to be limited to 249 tpy. Because the NOx emissions do not have the potential to exceed 250 tpy, an emission limit was not included for NOx emissions.

In order to avoid MACT requirements, HAP emissions will continue to be limited to less than 10 tpy for an individual HAP and 25 tpy for combined HAP emissions.

C. Permit Conditions

Previous Condition 3.5.2 was deleted in Amendment No. 2499-107-0030-V-03-1 because it concerned routing emissions from Pelleting Process A back to the burner and the facility is not claiming any emission control from the burner. This condition was no longer necessary and is not included in the renewed permit.

Previous Condition 3.5.4 was deleted in Amendment No. 2499-107-0030-V-03-1 because it concerned damper positions from the pellet mill exhaust stack for the burner and the facility is not claiming any emission control from the burner for the pellet mill exhaust stack, this condition is not necessary. This condition was no longer necessary and is not included in the renewed permit.

Since these two conditions were deleted, the conditions were renumbered for this Title V renewal.

- Condition 3.2.1 limits the production in Pellet Process A and Dryer DY2 to 150,000 tpy of oven dried chips. As requested by the facility, this condition was modified in this application based on production data and revised emission factors from testing conducted in October 2020.
- Condition 3.2.2 limits the processing of dry wood shavings for Pellet Process B to 150,000 tpy. As requested by the facility, this condition was modified in this application based on production data and revised emission factors from testing conducted in October 2020.
- Condition 3.4.1 subjects the applicable equipment in the emission unit table in Section 3.1 to Georgia Rule (b).
- Condition 3.4.2 subjects the applicable in the emission unit table in Section 3.1 equipment to Georgia Rule (e).
- Condition 3.4.3 subjects the applicable equipment in the emission unit table in Section 3.1 to Georgia Rule (n). Condition 3.4.5 from Permit Amendment No. 2499-107-0030-V-03-3 was combined with this condition and limits the dust from fugitive emissions to 20% as required by Georgia Rule (n).
- Condition 3.4.4 subjects the fuel fired in the Burner to Georgia Rule (g) fuel sulfur content limit.
- Condition 3.5.1 requires the use of control devices when the associated equipment is operated.
- Condition 3.5.2 requires at least 45% of the Dryer emissions to be recycled to the Dryer Burner (BU1).
- Condition 3.5.3 was added in Amendment No. 2499-107-0030-V-03-3 to establish a dryer inlet gas temperature, burner outlet gas temperature and recycle airflow damper position in order for the established emission factors to remain consistent with performance test results. The wood dryer inlet gas temperature was updated to “at or below 940 °F”, burner outlet gas temperature to at least 1400°F and the recycle damper position to at least 45% which is based on the most recent performance test.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing. Method 5 test method was included in Condition 4.1.3 in the renewal permit.

B. Specific Testing Requirements

Previous Condition 4.2.4 was deleted Amendment No. 2499-107-0030-V-03-1 because it concerned an initial performance test for Stack V which has already been completed. As a result, subsequent conditions were renumbered in this Title V renewal permit.

Previous Condition 4.2.5 had required the facility to measure and record the pressure drops in the recycled air duct and the Dryer recycle duct during performance tests. However, these parameters are not necessary because the facility is not claiming any emission control from the burner and these parameters do not need to be monitored. As a result, subsequent conditions were renumbered in this Title V renewal permit.

- Condition 4.2.1 was modified in Amendment No. 2499-107-0030-V-03-3 to require a performance test every three years to verify VOC and HAP emission factors for the Dryer and Pelleting Process A. The performance test also establishes the dryer inlet gas temperature, burner outlet gas temperature and recycle airflow damper position. The initial performance test requirement was deleted since this has been conducted. Testing is only conducted on one line since it is assumed that the other production line will have similar results.
- Condition 4.2.2 was modified in Amendment No. 2499-107-0030-V-03-3 to require a performance test every three years to verify PM emission factors for the Dryer, Pelleting Process A, Pelleting Process B and the Fuel Hammermill. The performance test also establishes pressure drops for the Dryer cyclone (Stack A), the Pelleting Process A baghouse (Stack BH1), the Pelleting Process B baghouse (Stack BH2) and the Fuel Hammermill cyclone. The initial performance test requirement was deleted since this has been conducted.
- Condition 4.2.3 was modified in Amendment No. 2499-107-0030-V-03-3 to require a performance test every three years to verify CO emission factors for the Dryer. The performance test also establishes the dryer inlet gas temperature, burner outlet gas temperature and recycle airflow damper position. The initial performance test requirement was deleted since this has been conducted.
- Condition 4.2.4 requires the monitoring systems to be operating correctly prior to testing in order to obtain accurate results while testing.
- Condition 4.2.5 requires the facility to operate under normal conditions for testing in order to obtain test results that reflect normal operations.
- Condition 4.2.6 requires the facility to submit a permit modification application if the test results reveal higher emission factors than the ones listed in Section 6 of the permit.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

- Condition 5.2.1 was modified in Amendment No. 2499-107-0030-V-03-3 to require continuous monitoring of the damper position and the determination of the three-hour rolling average damper position. This will ensure that the damper position is maintained and that the specified amount of recycle airflow is being routed to the dryer. This condition only pertains to the damper position since the temperature requirements are located in Conditions 5.2.3 and 5.2.13.
- Condition 5.2.2a. requires weekly pressure drop monitoring from the baghouses to ensure proper working conditions.
- Condition 5.2.2b. requires weekly pressure drop monitoring from the cyclones to ensure proper working conditions.
- Condition 5.2.3 was modified in Amendment No. 2499-107-0030-V-03-3 to require continuous monitoring of the burner outlet gas temperature and the determination of the three-hour rolling average burner outlet gas temperature. This will ensure that the burner is being operated at or above the temperature determined during the performance tests.
- Conditions 5.2.4 and 5.2.5 had previously subject the burner to CAM requirements. However, the burner is no longer considered a control device and the facility does not take emission reduction credits for any emissions vented through the burner. As a result, the burner is not subject to CAM. Because this application is a renewal application, all other control devices were reviewed for CAM that were not subject during the initial Title V application.
- Condition 5.2.6 requires visible emission checks for the baghouses.
- Condition 5.2.7 requires a preventive maintenance program for the baghouse which will include weekly checks to ensure proper operating conditions.
- Condition 5.2.8 requires weekly checks of the cyclones to ensure proper operating conditions.
- Condition 5.2.9 requires routine maintenance for all control equipment. The facility is also required to document any maintenance performed on the control equipment.
- Condition 5.2.10 requires the facility to maintain critical spare parts for all control equipment in order to minimize downtime.
- Condition 5.2.11 requires continuous monitoring of the dryer inlet gas temperature and the determination of the three-hour rolling average dryer inlet gas temperature. Since the temperature of the dryer varies with varying amount of moisture in the wood, this will ensure that the dryer is being operated at the temperature determined during the performance tests.
- Condition 5.2.12 requires opacity monitoring for all fugitive emission sources.

C. Compliance Assurance Monitoring (CAM)

VOC emissions had previously been controlled with the burner. However, the facility does not take emission reduction credit for emissions exhausted through the burner. Since the burner is no longer being considered a control device, the burner will not be subject to CAM for CO, VOC and HAP emissions.

Because this application is a renewal application, all other control devices were reviewed for CAM that were not subject during the initial Title V application. It was determined that the PM emissions for the cyclone for the Fuel Hammermill cyclone, the Burner/Dryer cyclone, Pelleting Process A baghouse, and Pelleting Process B baghouse exceeded the major source threshold prior to the control device. Therefore, these four PM control devices were subject to CAM for PM. Conditions 5.2.4 and 5.2.5 were revised in the application to subject these to CAM.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

- Condition 6.1.7b.i. requires an exceedance report for any 12-month rolling total of VOC emissions equal to or exceeding 249 tons.
- Condition 6.1.7b.ii. requires an exceedance report for any 12-month rolling total of CO emissions equal to or exceeding 249 tons.
- Condition 6.1.7b.iii. requires an exceedance report for any 12-month rolling total of any single HAP emissions equal to or exceeding 10 tons.
- Condition 6.1.7b.iv. requires an exceedance report for any 12-month rolling total of total HAP emissions equal to or exceeding 25 tons.
- Condition 6.1.7b.v. requires an exceedance report for any 12-month rolling total of PM emissions equal to or exceeding 249 tons.
- Condition 6.1.7c.i. requires an excursion report for any instance in which any pressure drop readings, required by Condition 5.2.2, are outside of the range established.
- Condition 6.1.7c.ii. requires an excursion report for any instance in which the visible emissions are observed per Condition 5.2.6.
- Condition 6.1.7c.iii. requires an excursion report for any three-hour average Dryer (DY2) recycle air damper position measured and recorded as required by Condition 5.2.1 is less than 45% open position or the open position established during most recent performance test.
- Condition 6.1.7c.iv. requires an excursion report for any three-hour average temperature at the inlet of Dryer (DY2) measured and recorded as required by Condition 5.2.11, is above 940°F or the temperature established during most recent performance test.
- Condition 6.1.7c.v. requires an excursion report for any three-hour average temperature at the burner outlet gas temperature measured and recorded as required by Condition 5.2.3, is below 1400°F or the temperature established during most recent performance test.
- Condition 6.1.7c.vi. requires an excursion report for any two consecutive opacity readings from fugitive emission sources above 10 percent as required by Condition 5.2.12.

B. Specific Record Keeping and Reporting Requirements

- Condition 6.2.1 requires the facility to maintain records of the amount of wet wood chips processed in the Dryer, the amount of dried wood chips processed in the Hammermills, the amount of dried wood chips processed in the Pellet Mills, the amount of dried wood chips processed in the Pellet Coolers and the total amount of wood chips processed through the Fuel Hammermill and the total amount of product handled for storage and handling. These will be used in emission calculations.
- Condition 6.2.2 requires monthly PM emission calculations. The condition provides guidance for

calculation and provides the emission factors. The PM emission factor for the dryer is based on the test from October 2020 and was revised in the application.

- Condition 6.2.3 calculate the monthly VOC, formaldehyde, acetaldehyde, and methanol emissions. The emission factors were updated in this application and are based on the test from October 2020. Only one production line is tested since it is assumed that the other production line will have similar results.
- Condition 6.2.4 requires a notification if any one month of PM emissions exceed 20.75 tons.
- Condition 6.2.5 requires a notification if any 12 month rolling total of PM emissions exceed 249 tons.
- Condition 6.2.6 requires the monthly VOC, formaldehyde, acetaldehyde, and methanol emissions to be used to calculate 12 month rolling emission totals.
- Condition 6.2.7 requires the facility to notify the Division if any one month of VOC emissions exceeds 20.75 tons, if any month of a single HAP emission exceeds 0.83 tons or if any one month of combined HAP emissions exceeds 2.08 tons.
- Condition 6.2.8 requires notifications if any twelve-month emission total for a single HAP exceeds 10 tpy or if any twelve-month emissions total for the combined HAPs exceeds 25 tpy.
- Condition 6.2.9 requires notifications if the twelve month rolling total of VOC emissions exceed 249 tpy.
- Condition 6.2.10 requires monthly CO emission calculations. The condition provides guidance for calculation and provides the emission factors. The emission factor was updated based on test from October 2020.
- Condition 6.2.11 requires a notification if any one month of CO emissions exceed 20.75 tons.
- Condition 6.2.12 requires a notification if any 12 month rolling total of CO emissions exceed 249 tons.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//